

IN THE SUPERIOR/STATE COURT OF RICHMOND COUNTY
STATE OF GEORGIA

LISA RUSHTON

CIVIL ACTION,
NUMBER 2000-RCCV-535

PLAINTIFF

VS.

JAMES BROWN d/b/a

THE NEW JAMES BROWN ENTERPRISES

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

ELDRIDGE SUGGS, IV
55 MARIETTA ST., STE. 2000
ATLANTA GA 30303

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 4th day of August, 2000

Clerk of Superior/State Court

By

Beverly K. Culley
Deputy Clerk

IN THE STATE COURT OF RICHMOND COUNTY
STATE OF GEORGIA

LISA RUSHTON,

Plaintiff,

JAMES BROWN d/b/a/
THE NEW JAMES BROWN ENTERPRISES

Defendants.

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*CIVIL ACTION FILE NO. 2000-PCCV-348

FILED IN THIS OFFICE
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CLERK SUP. RICHMOND COUNTY

COMPLAINT FOR DAMAGES

COMES NOW, LISA RUSHTON, Plaintiff in the above-styled action and files this her complaint for Damages and shows the Court as follows:

PARTIES AND JURISDICTION

1.

Plaintiff Rushton is a resident of Marietta, Cobb County, Georgia.

2.

Defendant James Brown d/b/a/ The New James Brown Enterprises may be personally served at [REDACTED], Augusta, Georgia 30909. Defendant is subject to the venue and jurisdiction of this Court.

FACTS COMMON TO ALL COUNTS

3.

Plaintiff Rushton realleges the allegations contained in paragraphs 1 through 7 as if fully restated herein.

4.

In 1991 Plaintiff Rushton became employed with Defendant James Brown Enterprises to sing as a back up singer for the entertainer Defendant James Brown.

5.

In 1993 Plaintiff Rushton stopped working for Defendant Brown in order to give birth.

6.

In 1994 Lisa Rushton resumed working for Defendant Brown. Immediately after resuming work, Defendant Brown began to request sexual favors from Plaintiff Lisa Rushton exclaiming "what we do is between us and God." Plaintiff Rushton denied all request for sexual favors. In or about July, 1994 Defendant Brown insisted that Plaintiff Lisa Rushton be fitted with the Norplant Birth Control Device.

7.

In November of 1994 Defendant Brown requested to pay for the flight of Plaintiff Rushton in order to have sex with him, again stating to Plaintiff Rushton "what we do is between us and God." Plaintiff Rushton again denied Defendant's advances.

8.

In December of 1995 as retaliation for Plaintiff denying his sexual advances Defendant Brown reduced the amount of shows Plaintiff could sing in.

9.

In March of 1996 Defendant Brown again made sexual advances toward Plaintiff Rushton, and Plaintiff Ruston refused the advances.

10.

In August of 1996 Defendant Brown gave Plaintiff Lisa Rushton an ultimatum to have sex with him or to not travel with the group to Spain in order to perform.

11.

In September 1996, in response to Plaintiff denying Defendant's sexual advances, Defendant Cut Plaintiff's pay by \$300.00.

12.

On or about August 5, 1998 Defendant Brown summoned Plaintiff to his home in order to complete some work duties. While Plaintiff was at the Defendant's home, the Defendant placed his hand upon the buttocks of Plaintiff, whereupon Plaintiff slapped Defendant's face.

13.

In June of 1999, while on tour in New York City, Defendant yelled and ordered in front of a crowd inside a popular restaurant that Plaintiff should not look or talk to any other man other than himself.

14.

In June 1999 while performing at Avery Fisher Hall in New York, and in front of a crowded back stage, Defendant Brown yelled at Plaintiff that "she wasn't shit and would never amount to shit."

15.

In June of 1999 Plaintiff could take no more abuse and was forced to quit.

COUNT 1

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

16.

Plaintiff realleges the allegations contained in paragraphs 1-15 as fully restated herein.

17.

Defendant Brown intentionally inflicted emotional distress upon Plaintiff Rushton through the use of obscene, sexual, abusive language, and by touching Plaintiff on her buttocks.

18.

As a result of Defendant's intentional acts, Plaintiff Rushton was injured in her peace, happiness, and feelings.

COUNT II

SEXUAL HARASSMENT

19.

Plaintiff realleges the allegations contained in paragraphs 1-18 as if fully restated herein.

20.

Defendant's actions and remarks were willful, and intentionally directed at harming Plaintiff, creating a hostile work environment.

21.

Defendant's actions naturally caused plaintiff to be humiliated and outraged causing Plaintiff mental suffering.

22.

As a result of Defendant's harassment, Plaintiff has incurred actual damages for which she is entitled to recover.

23.

As a result of Defendant's harassment, Plaintiff has incurred special damages for which she is entitled to recover.

24.

As a result of Defendant's harassment, Plaintiff Rushton has experienced mental pain and suffering for which she is entitled to be compensated.

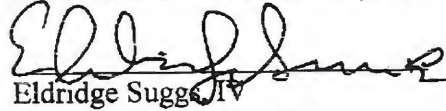
25.

As a further result of the aggravating circumstances surrounding Defendant's harassment, plaintiff is entitled to punitive damages, pursuant to O.C.G.A. Sec. 51-12-5.1, in order to "penalize, punish, and deter" the defendant from similar conduct.

WHEREFORE, Plaintiff respectfully prays as follows:

- a) that service of process issue as provided by law;
- b) that Plaintiff have judgment against Defendant for her actual damages;
- c) that Plaintiff have judgment against Defendant for her special damages;
- d) that Plaintiff have judgment against Defendant for her mental pain and suffering;
- e) that Plaintiff have judgment against Defendant for punitive damages in an amount sufficient to penalize, punish and deter the Defendant's from similar conduct in the future;
- f) for any other relief this Court deems just and appropriate;
- g) Plaintiff respectfully request a jury trial.

Respectfully Submitted,
THE SUGGS LAW FIRM, P.C.

A handwritten signature in black ink, appearing to read 'Eldridge Suggs IV', is written over the printed name.

Eldridge Suggs IV
Georgia Bar No. 690807

Counsel for Plaintiff

IN THE STATE COURT OF RICHMOND COUNTY

STATE OF GEORGIA

CIVIL ACTION FILE NO. 2000-RCCV-535

LISA RUSHTON,

PLAINTIFF,

VS.

JAMES BROWN d/b/a THE NEW JAMES
BROW ENTERPRISES,

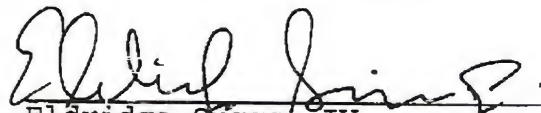
DEFENDANT.

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CLERK OF SUPERIOR COURT
AND JUDICIAL COURT
RICHMOND COUNTY, GA.

DISMISSAL WITH PREJUDICE

NOW COMES plaintiff in the above-captioned case acting through Eldridge Suggs, IV, The Suggs Law Firm, P.C., and as pursuant to Rule 41 of the Georgia Civil Practice Act hereby dismisses the claims in the above-captioned case with prejudice.

This 8th day of OCTOBER, 2001.



Eldridge Suggs, IV
Georgia Bar No. 690807
Attorney for Plaintiff
The Suggs Law Firm, P.C.
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